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DFT, Inc. d/b/a The Cannon  
Management Company

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COPPER SANDS HOMEOWNERS  
ASSOCIATION, INC., a Nevada non-profit  
corporation; MARCIA JARRETT; CHARLES  
WOOD; RICHARD DRESSLER; RICHARD  
EMANUEL; PAUL DOYLE; ARLENE  
MARENTIC; BOJAN NENADIC; EVERETT F.  
CROXSON; MYRA SCHULTZ; STEVEN  
GAZZA; MILORAD JAGROVIC; DAVID G.  
FERGUSON; JANE SOO HOO LUI; XUI YI  
QIU; DORON GERBY; CATALIN NISTOR;  
and HILARY GARBER, on their own behalf and  
on behalf of all others similarly situated; and  
POE HOMEOWNERS 1-2000,

Plaintiffs,

vs.

COPPER SANDS REALTY, LLC, a Delaware  
limited liability company; ROBERT COLUCCI,  
an individual; DARIO DELUCA, an individual,  
a/k/a DARIO DE LUCA; CBC INVESTMENTS,  
INC., a Nevada corporation; JIM CERRONE, an  
individual; COMPLEX SOLUTIONS, LIMITED,  
a Nevada limited liability company; COPPER  
SANDS INVESTORS LP, a Nevada limited  
partnership; COUNTRYWIDE HOME LOANS,  
INC., a New York Corporation; CS  
CONSULTING SERVICE, LLC, a Nevada  
limited liability company; TERESA CUSHMAN,  
an individual; RENATO DELUCA, an  
individual, a/k/a RAY DELUCA and RAY DE  
LUCA; DFT, INC., a California corporation,  
d/b/a THE CANNON MANAGEMENT

Case No.: 2:10-cv-00510-GMN-NJK

**STIPULATED REQUEST AND  
ORDER TO EXTEND TIME FOR  
SUBMISSION OF A PROPOSED  
JOINT PRE-TRIAL ORDER**

**(Second Request)**

1 COMPANY; SHAWN HEYL, an individual; )  
 2 LYNDA HOANG, an individual; IRWIN )  
 3 MORTGAGE CORPORATION, an Indiana )  
 4 corporation; BRENT JONES, an individual; )  
 5 BRENT JONES SERVICES, INC., a Nevada )  
 6 corporation; MANIETTA ELECTRIC, INC., a )  
 7 California corporation; MORTGAGE LOAN )  
 8 SPECIALISTS, INC., a California corporation; )  
 9 PACIFICA ENTERPRISES HOLDINGS LP, a )  
 10 California limited partnership; PACIFICA )  
 11 ENTERPRISES, INC., a California corporation, )  
 12 PACIFICA ENTERPRISES LLC, a Nevada )  
 13 limited liability company; PACIFICA )  
 14 MARKETING SERVICES, LLC, a Nevada )  
 15 limited liability company; PACIFICA )  
 16 MARKETING SERVICES, LLC, a Nevada )  
 17 limited liability company d/b/a "CONDO )  
 18 CLUB", "CONDO CLUB LAS VEGAS", and )  
 19 "CONDO CLUB - LAS VEGAS"; PACIFICA )  
 20 REAL ESTATE INVESTMENTS, INC., a )  
 21 California corporation; PACIFICA REAL )  
 22 ESTATE SERVICES, INC., a California )  
 23 corporation; PLASTER DEVELOPMENT )  
 24 COMPANY, INC., a Nevada corporation, d/b/a )  
 25 "SIGNATURE HOMES" and "SIGNATURE )  
 26 HOMES, INC."; PREMIER COMMUNITIES, )  
 27 INC., a Nevada corporation; PREMIER )  
 28 FINANCIAL, LLC, a California limited liability )  
 company; PREMIER REALTY SERVICES, )  
 INC., a California corporation; PREMIER )  
 RESIDENTIAL, INC., a California corporation; )  
 VIMARK RE ENTERPRISES LLC, a California )  
 limited liability company; DOES 1-100; )  
 inclusive; ROE CORPORATIONS 1-100, )  
 inclusive; ROE BUSINESS ENTITIES 1-100, )  
 inclusive; and ROE GOVERNMENTAL )  
 ENTITIES 1-20, inclusive, )

Defendants. )

21  
 22 THERE BEING A STIPULATION AND AGREEMENT BETWEEN THE PARTIES,  
 23 THE PARTIES HEREBY SUBMIT THIS STIPULATED REQUEST AND ORDER for extension  
 24 of time for submission of the proposed joint pre-trial order, by and between Plaintiff, by its counsel  
 25 of record, Terry L. Wike Esq., of LAW OFFICES OF TERRY WIKE, and Defendant, the DFT,  
 26 INC. d/b/a The Cannon Management Company (hereinafter "Cannon" or "Cannon Management"),  
 27 by and through its attorneys of record, Peter C. Brown, Esq., and Karen M. Baytosh, Esq., of the  
 28 law firm of Bremer, Whyte, Brown & O'Meara, LLP, and Andrew C. Green, Esq., of the law firm

KOELLER NEBEKER, CARLSON & HALUCK, LLP, and the parties stipulate and request extension of time as follows and for the reasons stated below:

The parties request a two week extension of time for submission of a proposed joint pre-trial order; the requested extension seeks a new deadline for submission of a proposed joint pre-trial order as follows:

| Event  | Prior Deadline  | Proposed New Deadline |
|--|-----------------|-----------------------|
| Submission of Proposed Joint Pre-Trial Order | August 28, 2015 | September 11, 2015    |

Plaintiff specifically requests the extension of time due to scheduling conflicts impairing the ability of counsel for Plaintiff to meaningfully coordinate with counsel for Cannon Management for preparation of the joint pre-trial order, including identification of witnesses and exhibits as well as attempting stipulations regarding presentation or reference to same during trial. In particular, counsel for Plaintiff is also counsel for fourteen (14) Plaintiffs in the separate matter of *Seneca Falls V Homeowners Association et al. v. Heller Development Company et al.*, pending in Department 16 of the Eighth Judicial District Court of Nevada, Clark County Case #A669475 (hereinafter "*Seneca Falls matter*"); which is currently rapidly advancing towards trial with pre-trial motion work due last week, oppositions this week, and replies next week.

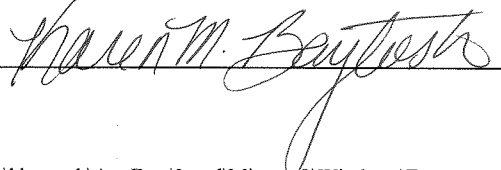
Preparation and participation in activities for the *Seneca Falls matter* currently consumes the time of Plaintiff's counsel such that Plaintiff through its counsel requests the two week extension for submission of the joint pre-trial order.

Cannon Management agrees with the request by Plaintiff, which is reasonable under the circumstances and also agrees the amount of additional time requested is reasonable to accommodate counsel for Plaintiff, but also to allow Cannon Management sufficient time to meet and confer with Plaintiff's counsel regarding the witnesses and documents, and any objections thereto.

DATED this 27<sup>th</sup> day of August, 2015.

BREMER WHYTE BROWN & O'MEARA

LAW OFFICES OF TERRY L. WIKE

By: 

By: /s/ Terry L. Wike, Esq.

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Attorneys for Plaintiffs

6 KOELLER, NEBEKER, CARLSON &  
7 HALUCK, LLP

8 By: /s/ Andrew Green, Esq.

9 Andrew Green, Esq.  
10 Nevada Bar No. 9399  
11 300 S. Fourth Street, Suite 500  
12 Las Vegas, NV 89101  
13 Attorney for Defendant  
14 DFT, Inc. d/b/a The Cannon Management Company

13 **ORDER**

14 **IT IS SO ORDERED** that the deadline for submission of the proposed joint pre-trial order  
15 for the above-referenced matter is extended to September 11, 2015.

16 **DATED:** August 27, 2015

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18 \_\_\_\_\_  
19 Gloria M. Navarro  
20 United States District Judge  
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